

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

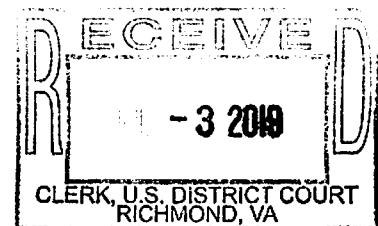
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL

*D.G. Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)*

June 30, 2019

Jason Goodman, CEO  
Multi-media System Design, Inc.  
252 7th Avenue  
Suite 6-S  
New York, NY 10001

Clerk of the Court, Room 3000  
U.S. District Court  
701 E. Broad St.  
Richmond, VA 23219



MATTER: **STEELE v. GOODMAN, 17-CV-00601-MHL**

**District Judge M. Hannah Lauck**

SUBJECT: **ATTEMPTED FRAUD ON THE COURT BY DEFENDANT  
GOODMAN**

REF: (a) **MANUAL CHAVEZ, III (DOB 03/21/1986), AZ DL DO1566834**

Good Morning:

1. This letter addresses the allegation that you (Defendant Jason Goodman) have conspired with yet another “CrowdSource The Truth” (CSTT) social media side-kick (ref: (a)) to suborn perjury and submit tainted evidence (under oath) to this Court to support your wild speculative conspiracy theory insinuations that ignore the truth.

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA**

## RICHMOND DIVISION

**MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

2. The conclusions and assertions you have presented to this Court under oath in ECF Doc. No. 134, para. 12 are fabrications based on your continued reckless disregard for truthful information and your apparent willful blindness to the truth as expressed in the social media content of you and your side-kick ref: (a). As explained below, your allegations in ECF Doc. No. 134, para. 12 are baseless, meritless, unfounded and are intended to deceive this court.

3. Below is your sworn statement to the Court (Exhibit I “eve”, ECF Doc. No. 78).

3. Below is your sworn statement to the Court (Exhibit I "eye", ECF Doc. No. 78).

Case 3:17-cv-00601-MHL Document 134 Filed 06/27/19 Page 8 of 44 PageID# 2259

12. As previously submitted in these proceedings, (ECF No. 78 EXHIBIT I) Intervenor Application D. George Sweigert, telephone Manuel Chavez III, making substantially the same claim, falsely stating that Defendant Goodman was paid by Black Cube (<http://www.blackcube.com>) a private intelligence firm in the UK comprised of former Mossad agents and operatives, according to their own public website.

4. EXF Doc. No. 78, EXHIBIT I is shown below.

Case 3:17-cv-00601-MHL Document 78-9 Filed 03/08/19 Page 1 of 103 PageID# 956

1

**EXHIBIT I**

**2 MANUEL CHAVEZ & D. GEORGE SWEIGERT LIVE STREAMED ON YOUTUBE 11.25.17.SOLVING.RAR**

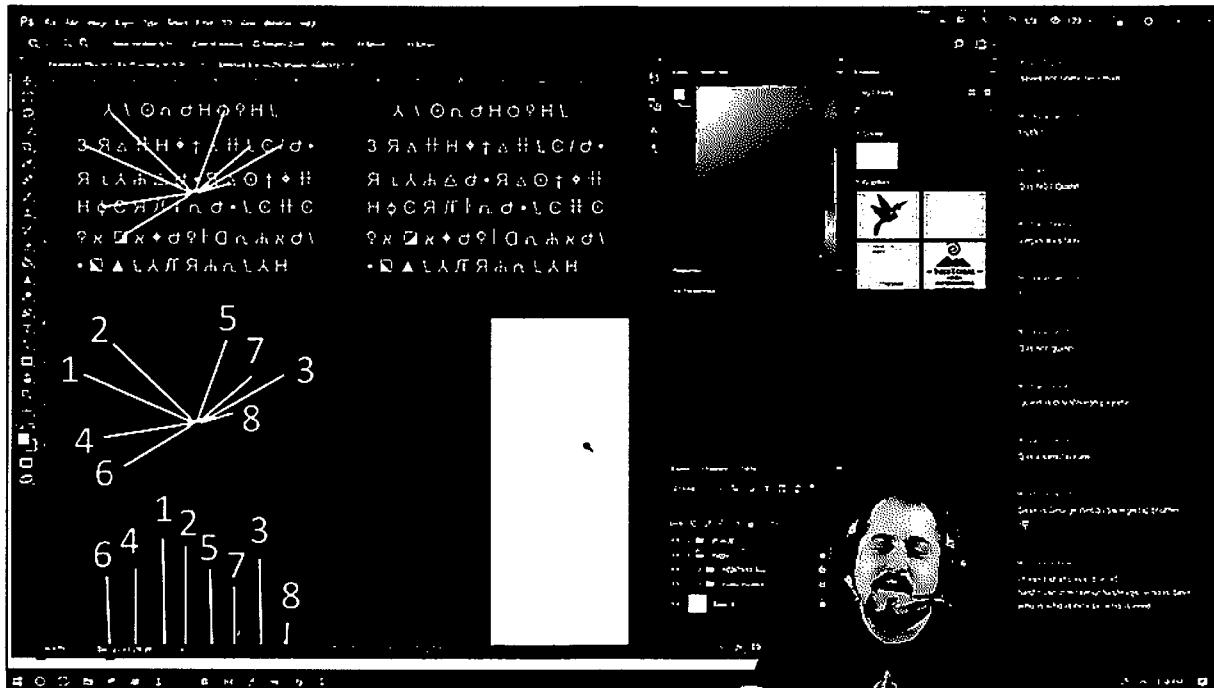
3 | 1

4 | 00:00:00,739 --> 00:00:07,130

5 | uh-huh yeah LTP did kind of get pawned

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION  
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

5. Below is a screen-shot of the actual YouTube video (note: ref: (a) is pictured).



**11.25.17.Solving.rar**



Streamed live on Nov 25, 2017  
Long day of puzzling and work

Internet URL: <https://www.youtube.com/watch?v=jK73oCxCGOE&t=4368s>

6. Ref: (a) states the following:

01.12:12 I have tried to take myself out of the whole – you now – fighting with Jason Goodman. But, you know I like to have to make at least some comments sometimes because there is weird stuff.

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA**

**RICHMOND DIVISION**

**MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

01.22.22 You know its really crazy to me to that I was picking up on something “Black Cube”. And I like have gotten some information about like .. some information from quote unquote “CIA source” talking about how Loomer and - what’s his name – Goodman were getting paid by some Black Cube operative. Then it started clicking in my head.

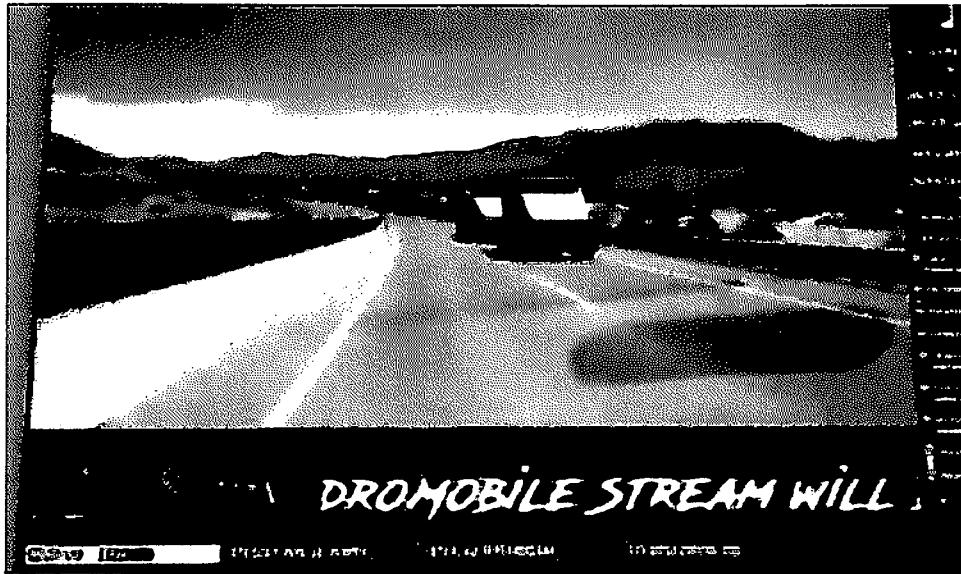
7. As you are well aware, ref: (a) has recently made a series of YouTube social media videos to support his testimony in a related case known as:

**U.S. District Court  
for the District of Columbia  
RICH v. BUTOWSKY et al  
CASE #: 1:18-cv-00681-RJL  
Judge Richard J. Leon**

8. In these recent YouTube videos it has been clearly stated by ref: (a) that it is his testimony in the above case that he was a member of a group of “reputation protection” operatives allegedly directed by Matt Couch (defendant ion the above cited action). Ref: (a) has distributed in a widely pervasive manner, electronic messages from Matt Couch to support his testimony. Ref: (a) has also been vocal about evidence that he has furnished to you as well.

9. As you are aware, you made a telephone call to ref: (a) while he was broadcasting a live YouTube video stream (during the actual call you seem to be unaware that your voice was concurrently broadcast to the Internet). Although ref: (a) has removed the video from public social media display, several copies of your interaction have been made and placed on the internet by unknown third parties.

UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION  
MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL



10. A copy of this video content can be located here:

YouTube defango jason goodman

THIS VIDEO MODIFIED FOR PARODY PURPOSES NO #GAYOPS

Jason Goodman and Defango Collude on Conspiracy Theory

Free Speech Fair Use

Subscribers: 34

34 views

Internet URL: <https://www.youtube.com/watch?v=It5SFuVxhMM&t=266s>

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA**

**RICHMOND DIVISION**

**MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

**TRANSCRIPT OF DISCUSSION**

REF: (A): Oh, Jason Goodman is calling me. Hello Jason Goodman.

GOODMAN: Manual Chavez, how are you.

REF: (A): I am doing alright, just heading to Arizona right now.

GOODMAN: OH, ok. So I guess you are in a bit of a drive. I don't know if you had a chance to see my messages, but one thing I would really like to get – if you're able to send it – is either a screen capture from Patreon of . uh .. the dash board, or the initial e-mail Patreon that sends you that says AMABISS has become a Patreon and shows an e-mail of that account.

....

REF: (A): I can send that over to you no problem, actually. Garble. I actually did get that e-mail . and .. all .. uh .. and I have a couple of messages for how ever many months she was on my thing and I will send you like a copy of that it shows the date and what e-mail she was using.

....

GOODMAN: Something you would write to the Bar Association saying "hey, look, this judge determined that it is likely that Biss is making these inappropriate payments. He is not supposed to be paying you, if you're his client, and particularly if that payment is coming at a time you are engaged in activities like making videos about his lawsuit, that spread allegations out across the Internet, that aren't true. Things like that. So, that is my position that he had someone paying you to do that stuff. He's been working with Robert David Steele, you were working for Robert David Steele, at the time, Sweigert [undersigned] was working with you, Tyroan Simpson was working with you and Sweigert and these are the elements of conspiracy.

REF: (A): Yeah, I mean you got the conspiracy down pretty well. I mean. I will send you everything that shows she was on my Patreon and she was paying me on Patreon, for sure. But, was I working in concert with Dave Acton

**UNITED STATES DISTRICT COURT, FOR THE EASTERN DISTRICT OF VIRGINIA**

**RICHMOND DIVISION**

**MATTER: STEELE v. GOODMAN, 17-CV-00601-MHL**

[undersigned] and those guys, yeah, f\_ck it, why not. I will say whatever.

(Laughter)

11. There are other issues associated with your ECF Doc. No. 134, para. 12. Amongst these legal insufficiencies, (i) whether or not the purported evidence you propound rises to the level of sufficiency in the light of the Federal Rules of Evidence, and (ii) your use of hearsay to attempt to attribute comments to the undersigned made by ref: (a) about Black Cube (as broadcast in the video you have described as EXHIBIT I, to ECF Doc. No. 78).

12. The legal sufficiency of the electronic messages you provide as evidence also present an open question considering the legal sufficiency requirements of the F.R.E.. As the public record clearly demonstrates, you have had a long-standing relationship with ref: (a) dating back to the infamous “Who Spoofed the Seth Rich Files” episodes of CSTT (first two weeks of June 2017 – immediately prior to your closure of the Port of Charleston, S.C. on June 14, 2017 due to your CSTT YouTube video podcasts).

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 30/ day of June, 2019.



D. GEORGE SWEIGERT, C/O  
P.O. BOX 152  
MESA, AZ 85211

Attached: Copies sent to other district courts

Sweigert v. Goodman, USDC for the SDNY

D. George Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

June 24, 2019

Jason Goodman, CEO  
Multimedia Systems Designs, Inc.  
252 7<sup>th</sup> Avenue, APT #6-S  
New York, NY 10001-7334

[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

PRO SE DIVISION, ROOM #200  
Clerk of the Court  
U.S. District Court for the SDNY  
(FOLEY SQUARE)  
500 Pearl Street  
New York, New York 10007-1312

**SUBJECT: SWEIGERT V. GOODMAN,  
CIVIL CASE #: 1:18-CV-08653-VEC  
JUDGE VALERIE E. CAPRONI**

**REF: (a) Oversight concerning copies of pertinent letters**

Dear Sir:

1. Due to an oversight the attached two letters were not copied to you.

Signed this 24 day of June, 2019



D. George Sweigert, pro se plaintiff

D. George Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
Sporiation-notice@mailbox.org

June 18, 2019

**EDWARD BUTOWSKY**  
**2200 Bradbury Court**  
**Plano, TX 75093**

and

**Clerk of the Court**  
**U.S. District Court**  
**for the District of Columbia**  
**333 Constitution Avenue N.W.**  
**Washington D.C. 20001**

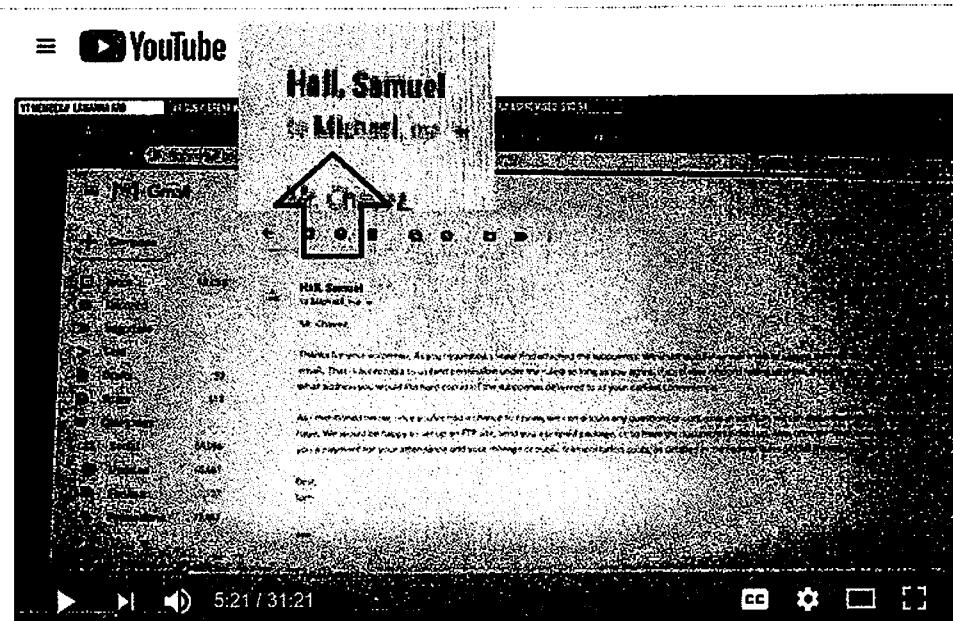
SEARCHED  
INDEXED  
SERIALIZED  
FILED  
2019 JUN 21 AM 11:21  
S.D. OF N.Y.

**SUBJECT:** RICH v. BUTOWSKY et al  
**CASE #:** 1:18-cv-00681-RJL  
**Judge Richard J. Leon**

**REF: (a) Whereabouts of a potential witness: Manual A. Chavez, III**

**To the Clerk:**

1. The undersigned is a non-party that has observed the behavior of a potential witness. In video content posted by ref: (a) it appears he is willing to voluntarily accept service of a subpoena from the plaintiff's counsel.
  
2. On June 17, 2019 ref: (a) published the video entitled, *Defango Get's subpoena'd in the Aaron Rich Lawsuit - #sethrich Files*, via Internet URL <https://www.youtube.com/watch?v=yLnzqcsjPX8> (pictured below) which displays the e-mail message content of plaintiff's counsel.



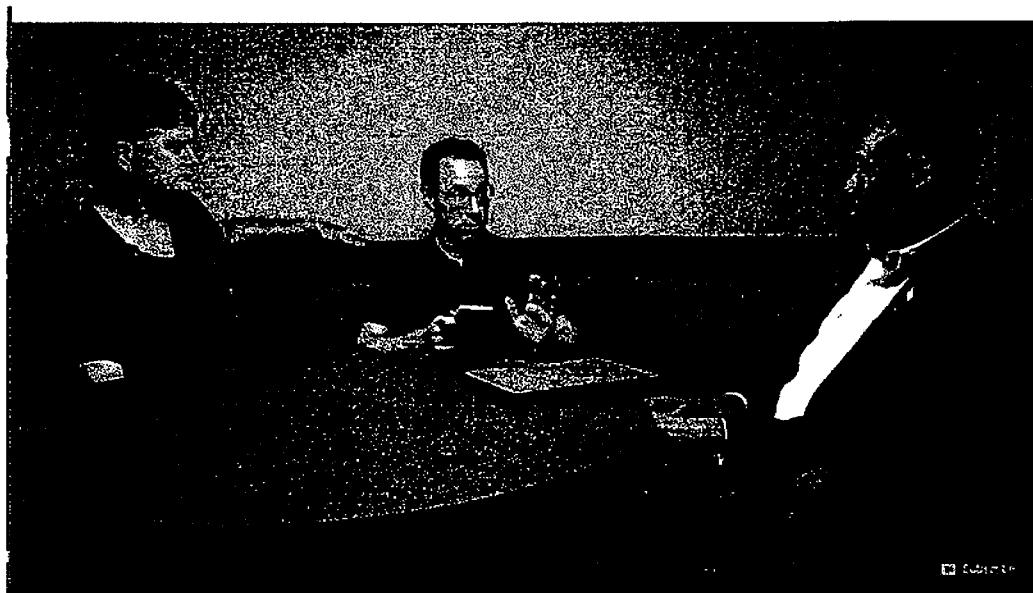
**Defango Get's subpoena'd in the Aaron Rich  
Lawsuit - #sethrich Files**



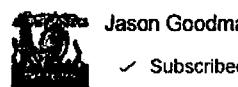
3. At time-mark 28:35 ref: (a) proclaims, "Hey, Jason Goodman. Yo, Jason Goodman, mumble Jason Goodman. Jason. Are you watching Jason Goodman?." Ref: (a) then proposes that Mr. Goodman wait for ref: (a)'s e-mail messages to be turned over to plaintiff's counsel before using such evidence in either one of two lawsuits (shown below).

- ROBERT DAVID STEELE vs. JASON GOODMAN, U.S.D.C. for the Eastern Dist. Of Virginia (Richmond), 17-CV-00601-MHL.
- SWEIGERT vs. GOODMAN, U.S.D.C. for the Southern District of New York, 1:18-CV-08653-VEC [the undersigned is the plaintiff in that case]

4. This dramatic request by ref: (a) appears related to the alleged coordination and participation of ref: (a) with Jason Goodman and his then business partner George Webb Sweigert [undersigned's brother] to interview former detective Rod Wheeler (the subject of ECF Doc. No. 62 [6/12/19]).
5. In the video publication of June 5, 2017, entitled "*Crowdsource the Truth Interviews Rod Wheeler*", Internet URL: <https://www.youtube.com/watch?v=yDI0AFOHuNI&t=1609s>, the three discuss the Rich family at length. Pictured below, left to right, George Webb Sweigert (currently a resident of Annapolis, Maryland), Jason David Goodman, (resident of New York, New York) and Rod Wheeler (resident of Upper Marlboro, Maryland).



### Crowdsource the Truth Interviews Rod Wheeler



Jason Goodman

✓ Subscribed

81K

43,614 views

+ Add to

Share

More

1,668 53

6. It is relevant to note that ref: (a), aka YouTube channel name MERLIN DEFANGO, and DEFANGO TV and LARP WARS, uses the name DEFANGO as an alias.

7. Ref: (a) distributed a video on August 6, 2017, entitled "*Fake News | Rod Wheeler and Seth Rich Case | Anti Radio Underground*" at Internet URL:

<https://www.youtube.com/watch?v=zDIkag3hmw>.



### Fake News | Rod Wheeler and Seth Rich Case | Anti Radio Underground



Defango TV

✓ Subscribed

20K

1,100 views

Signed this 24 day of June, 2019

D. S.

D. G. Sweiger, non-party

2.  
**D. George Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
Spoliation-notice@mailbox.org**

June 16, 2019

**EDWARD BUTOWSKY  
2200 Bradbury Court  
Plano, TX 75093**

and

**Clerk of the Court  
U.S. District Court  
for the District of Columbia  
333 Constitution Avenue N.W.  
Washington D.C. 20001**

**SUBJECT: RICH v. BUTOWSKY et al  
CASE #: 1:18-cv-00681-RJL  
Judge Richard J. Leon**

**REF: (a) Whereabouts of a potential witness: Manual A. Chavez, III**

**To the Clerk:**

1. The undersigned is a non-party that has observed the behavior of a potential witness to escape service of subpoena process in this litigation. This behavior is documented in a series of YouTube social media videos produced and distributed by ref: (a).
  
2. On June 14, 2019 ref: (a) published the video entitled, *Daywave Florida defango*, via Internet URL <https://www.youtube.com/watch?v=qOpPqp8KBuU>. In this video the witness request from counsel is displayed to the audience (see below).

2019 JUN 27 AM11:27  
S.D. OF MD.



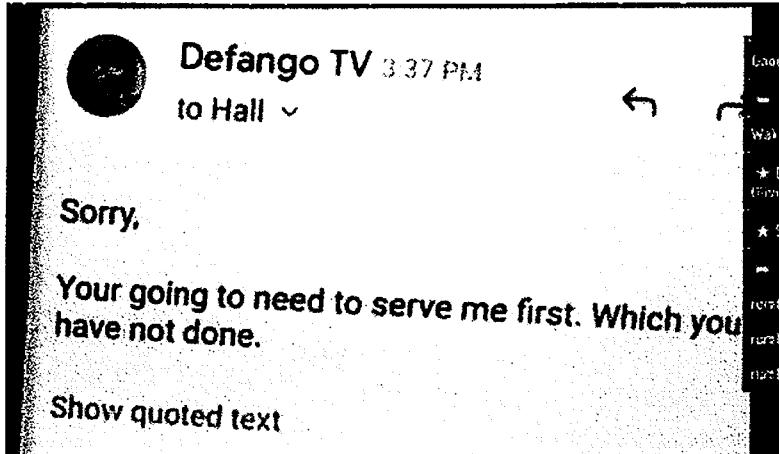
Daywave Florida defango

345 views

16 33 4 SHARE SAVE

As you know, we represent Aaron Rich in a suit against Ed Butowsky, Matt Couch, and America First Media, alleging defamation based on statements Mr. Butowsky and Mr. Couch made about Mr. Rich and his family. To be clear, you are not a party in this lawsuit. We have reached out to you only because we believe you have relevant information to our case and we hope to obtain that information in a manner that imposes as little burden on you as possible.

3. Ref: (a) reads the e-mail message request to his world-wide audience then remarks [time-mark 15:12]. "Sorry, Your going to need to serve me first. Which you have not.". (see below).



4. It is relevant to note that ref: (a), aka YouTube channel name MERLIN DEFANGO, and DEFANGO TV and LARP WARS, and uses the name DEFANGO as an alias. His whereabouts presently are in Pensacola, Florida; but, his base of operations appears to be Carson City, Nevada.

5. Ref: (a) discusses the filing of a Virginia police report (purportedly filed by the wife of the ex-attorney of ref: (a)) with a Carson City Police Officer in the video production published May 18, 2019, entitled *Visited by cops – Virginia Police call – Defango TV* via Internet URL: <https://www.youtube.com/watch?v=YwWG3ZOuOsg&t=60s> (see below).



**Visited by cops - Virginia Police call - Defango TV**

Defango TV

✓ Subscribed 20K

3,305 views

+ Auto Share More

14 107 27

6. The former attorney of ref: (a) in question – Steven Biss – apparently represented ref: (a) at one time in a matter that was never filed in the state courts of Arizona. Ref: (a) is also a potential witness in the lawsuit known as ROBERT DAVID STEELE vs. JASON GOODMAN, U.S.D.C. for the Eastern Dist. Of Virginia (Richmond), 17-CV-00601-MHL.

7. There are Internet web-sites that purport to display the present address for ref: (a) in Carson City, Nevada.

by consumers, for consumers...



Don't let them get away with it!® Let the truth be known!™

Con

■ Revie

■ Total Visits since 1997: 9,008,617,292 ■ Estimated Money Consumers Saved since 1997: \$15,765,080,261 ■ Reports filed: 2,585,323

Programs &  
Services

Help &  
FAQs

Consumer  
Resources

Verified Business  
Directory

Legal  
Directory

Consumers Say  
Thank You

In The  
Media

Report: #1476284

## Complaint Review: Merlin Defango - Carson City

Don't let them  
Get away with it!



Make sure they make  
the Ripoff Report!

■ Submitted: Sat, March 30, 2019 ■ Updated: Sun, March 31, 2019  
■ Reported By: James — Wisconsin United States

■ Merlin Defango  
17■ Nevada St  
Carson City,  
United States  
■ Phone: 480-868 1■  
... .

Internet URL:

<https://www.ripoffreport.com/report/merlin-defango/carson-city-tv-manuel-chavez-1476284>

8. In a video distributed on June 3, 2017, entitled *Jason Goodman and CO spoofed the SethRich [soc] files on accident*, via Internet URL:

<https://www.youtube.com/watch?v=adJ2FxWJZCE>. In this video DEFANGO (ref: (a))

describes his understanding of purportedly stolen files from the Democratic National Committee (DNC) that were in the possession of Jason Goodman (defendant in the Virginia lawsuit).

Apparently, Mr. Goodman had transmitted the allegedly stolen information (protected personally identifiable information) of DNC donors (names, addresses and amounts) to DEFANGO for file forensics (see below).



Jason Goodman and CO spoofed the SethFiles files on accident  
ahaha



Signed this 24 day of June, 2019



D. George Sweigert, non-party



D. George Sweigert, c/o  
P.O. Box 152  
Mesa, AZ 85211  
spoliation-notice@mailbox.org

UNITED STATES POSTAL SERVICE.		Retail
P	US POSTAGE PAID <b>\$7.35</b>	Origin: 95662 06/24/19 0556740662-3
PRIORITY MAIL 2-Day ®		0 Lb 3.30 Oz 1006
EXPECTED DELIVERY DAY: 06/26/19		C014
SHIP TO: 500 PEARL ST NEW YORK NY 10007-1316		
USPS TRACKING NUMBER		
		9505 5158 1613 9175 3448 02
<small>Da ■ Date X US ■ United States Int'l ■ International Lin ■ Line Pic ■ Picture Or ■ Order Wh ■ Whole der ■ Delivery * D ■ Domestic</small>		

TO:

PRO SE DIVISION, ROOM #200  
Clerk of the Court  
U.S. District Court for the SDNY  
(FOLEY SQUARE)  
500 Pearl Street  
New York, New York 10007-1312

To schedule free  
Package Pickup,  
scan the QR code.



EP14F Oct 2018  
07-12-19 9:15 AM



D S 0 0 0 0 1 0 0 0 0 1 4



This envelope is made from post-consumer waste. Please recycle - again.

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE,

Plaintiff,

-against-

JASON GOODMAN,

Defendant.

**17-CV-00601-MHL**

**CERTIFICATE OF SERVICE**

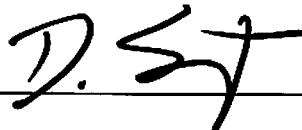
It is hereby certified that the accompanying materials have been placed in the U.S. Postal Service with First Class mail postage affixed and addressed to the following parties:

**Clerk of the Court  
U.S. District Court  
701 E. Broad St.  
Richmond, VA 23219**

**Jason Goodman  
252 7th Avenue  
Suite 6-S  
New York, NY 10001**

**Susan A. Holmes  
( Lutzke )  
2608 Leisure Drive  
Apt. B  
Ft. Collins, CO 80525**

I hereby attest that the foregoing is true and accurate under the penalties of perjury on this 30  
day of June, 2019.



**D. GEORGE SWEIGERT, C/O  
P.O. BOX 152  
MESA, AZ 85211**